erally held ultra vires and void. *In Re Third, Fourth and Fifth Avenues,* 49 Wash. 109, 94 Pac. 1075, 95 Pac. 862; *Pittsburgh C. C. & St. L. Ry. Co.* v. *Oglesby,* 165 Ind. 542, 76 N. E. 165; *Vrana* v. *St. Louis,* 164 Mo. 146, 64 S. W. 180. In Michigan it is held that such agreements are invalid if the improvement is one affecting "a general public or state interest," *e. g.* opening of new street, but valid if "matter of municipal interest," as in the case of laying a sewer. *Leggett* v. *Detroit,* 137 Mich. 247, 100 N. W. 566; *Coit* v. *Grand Rapids,* 115 Mich. 493, 13 N. W. 811. Massachusetts, New York, Minnesota and other states by statute allow such agreements under certain circumstances; but the terms of the statutes must be strictly followed. *Whitcomb* v. *Boston,* 192 Mass. 211, 78 N. E. 407.

MUNICIPAL CORPORATIONS—ORDINANCE IN GENERAL TERMS ADAPTED TO AFFECT A PARTICULAR INDIVIDUAL.—Plaintiff bought a lot in a residential district to erect thereon a livery stable, obtained a building permit, and started preliminary building operations. To prevent the opening of this stable, an ordinance was passed requiring a permit from the council for the opening or conducting of a livery business, and making the location of the building with regard to residential neighborhoods and churches an important consideration in granting or refusing a permit. Under this ordinance, a permit was refused plaintiff. *Held* that the ordinance and refusal of permit were proper. *Douglas* v. *City Council of Greenville* (S. C. 1912), 75 S. E. 687.

While livery-stables are not per se nuisances, a city may under statutory authority confine them to certain, prescribed localities. 2 DILLON, MUN. CORP. (5th Ed.), § 692; *Chicago* v. *Stratton,* 162 Ill. 494. Special and unwarranted discrimination renders an ordinance invalid. 2 DILLON, MUN. CORP. (5th Ed.), § 593; *Monmouth* v. *Pobel,* 183 Ill. 634; *Board of Council* v. *Renfro,* 22 Ky. Law Rep. 806, 58 S. W. 795, 51 L. R. A. 897. But if the ordinance applies to all persons engaged in the same business, such regulation of that business is not discriminatory. *Fischer* v. *St. Louis,* 167 Mo. 654, 194 U. S. 361; *State* v. *Crescent Creamery Co.,* 83 Minn. 284, 86 N. W. 107, 54 L. R. A. 466; *Lieberman* v. *Van De Carr,* 199 U. S. 552. Nor are the motives of the members of the council or other like municipal body in adopting an ordinance a subject of judicial inquiry for the purpose of invalidating the ordinance; 2 DILLON, MUN. CORP. (5th Ed.), § 580; *People* v. *Chicago,* 154 Ill. App. 578; *Shepard* v. *Seattle,* 109 Pac. 1067; *Helena* v. *Miller,* 88 Ark. 263, 114 S. W. 237; *People* v. *Gardner,* 143 Mich. 104, 106 N. W. 541.

PARENT AND CHILD—NEGLIGENCE OF CHILD—LIABILITY OF PARENT.—Defendant purchased an automobile for use of himself and family, and his minor son was authorized to use it at any time. The son, while using the machine for a pleasure drive with his sister and a friend who was a guest of the family, negligently injured the plaintiff. In a suit to recover for the injury, it was *held* that the father was liable, on the ground that the relation of master and servant existed between the defendant and his son. *McNeal* v. *McKain* (Okl. 1912), 126 Pac. 742.

Cases similar to this have given rise to considerable discussion. The case of *Doran* v. *Thomsen,* 76 N. J. L. 754, 71 Atl. 296, 19 L. R. A. N. S. 335, is